



U.S. Department of Justice

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May 5, 2023

Via Electronic Filing

Hon. Michael A. Shipp, U.S.D.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Proposed Consent Order Regarding Reply Brief
B.Y.C.C., et al. v. United States, No. 22-cv-06586
J.A.L.C., et al. v. United States, No. 22-cv-06587
R.J.P., et al. v. United States, No. 22-cv-06588

Dear Judge Shipp:

This Office represents Defendant the United States of America in the above-referenced matter. We write with the consent of Plaintiffs' counsel to submit the enclosed proposed consent order regarding the United States' time to reply to Plaintiffs' consolidated opposition to the United States' motions to dismiss. Good cause exists to enter this consent order because this case involves complex legal issues, and the proposed briefing schedule will provide the United States with the time needed to fully respond to the arguments made in Plaintiffs' opposition brief.

Please let me know if you have any questions or concerns. Thank you very much for your consideration of this proposed consent order.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney

By: /s/ Samantha R. D'Aversa
SAMANTHA R. D'AVERSA
Assistant U.S. Attorney
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cc: All counsel of record (via ECF)
AUSA John F. Basiak Jr.
AUSA Angela Juneau

Enclosure